



Please Reply To:

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May 31, 2006

Via Electronic Filing

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

RE: PacifiCorp's Motion for Standard Protective Order
UM 1118

Enclosed for filing is PacifiCorp's Motion for Standard Protective Order in the above-referenced matter. A copy of this filing was served on all parties to this proceeding as indicated on the attached certificate of service.

Sincerely,

A handwritten signature in cursive script that reads "Natalie Hocken".

Natalie L. Hocken

Enclosure

cc: Service List for UM 1118

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1118

In the Matter of)	
PACIFIC POWER & LIGHT)	PacifiCorp’s Motion for Standard
Request for Proposals for Renewable)	Protective Order
Generation Resources (RFP 2003-B) in)	
Compliance with Commission Order)	
No. 91-1383.)	

Pursuant to OAR 860-012-0035(1)(k), PacifiCorp moves for entry of the Commission’s standard protective order in this proceeding. PacifiCorp believes good cause exists for issuance of such an order to protect confidential and proprietary business information. In support of this motion, PacifiCorp states:

1. The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information. *See* OAR 860-11-000(3) (adopting Oregon Rules of Civil Procedure (“ORCP”)); ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade secrets or other confidential research, development, or commercial information”); *see also In re Investigation into the Cost of Providing Telecommunication Service (VA/I 351)*, Order No. 91-500 (1991) (recognizing that protective orders are a reasonable means to protect “the rights of a party to trade secrets and other confidential commercial information” and “to facilitate the communication of information between litigants”).

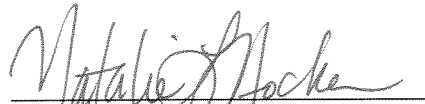
2. PacifiCorp anticipates that discovery in this proceeding may include propriety cost data and models, commercially sensitive pricing information, confidential market analyses and business projections, confidential third-party information, or

confidential information regarding contracts for the purchase of electric power, power services, or fuel. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential and proprietary business information.

Moreover, PacifiCorp has confidentiality obligations to potential bidders in the request for proposal process with which it must comply. Issuance of a protective order will facilitate the production of relevant information.

For the foregoing reasons, PacifiCorp requests entry of the Commission's standard protective order in this docket.

DATED: May 31, 2006.



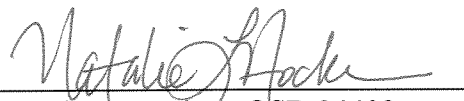
Natalie L. Hoeken, OSB 94409
Assistant General Counsel
PacifiCorp

Counsel for PacifiCorp

CERTIFICATE OF SERVICE

I certify that I have on May 31, 2006 served the foregoing document in Docket No. UM 1118 upon all parties of record in this proceeding by mailing a copy with first class postage prepaid and by electronic mail to the following person(s) at his or her last-known address(es) as indicated below and via email to said person(s) email address as indicated below:

OPUC Dockets
Jason Eisdorfer
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 308
Portland, OR 97205
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Natalie L. Hocken, OSB 94409
Counsel for PacifiCorp